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Attorneys for Defendant,
Patrick Byrne

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

ROBERT HUNTER BIDEN, an
individual,

Plaintiff,

vs.

PATRICK M. BYRNE, an individual,

Defendant.

Case No.: 2:23-cv-09430-SVW-PD
Judge: Honorable Stephen V. Wilson
Courtroom: "10A"

**DEFENDANT PATRICK BYRNE'S
OBJECTIONS TO PLAINTIFF'S
EXHIBITS**

Date: July 28, 2025
Time: 1:30 p.m.
Courtroom: "10A"

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

Defendant Patrick Bryne hereby issues his objections to Plaintiff Hunter Biden's Exhibits, as listed in his Exhibit list and Exhibit books:

<u>Ex.</u> <u>No.</u>	<u>Plaintiff's Exhibits</u>	<u>Defendant's Objections</u>
1.	Capitol Times Magazine, Issue 1, published on June 27, 2023 (RHB00001-99)	Objection: Lacks foundation, authenticity, irrelevant.
2.	Telegram post by Defendant Patrick Byrne on March 20, 2022, including associated comments (RHB00695)	Objection: Lacks foundation, authenticity, hearsay, irrelevant; improper character evidence, produced and identified late, in violation of FRCP Rule 26(f). (FRCP §§ 26(a)(3)(A)(iii), 26(f), <i>et seq.</i> ; FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
3.	Telegram post by Defendant Patrick Byrne on April 7, 2022, including associated comments (RHB00696)	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence, produced and identified late, in violation of FRCP Rule 26(f).

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<u>Ex. No.</u>	<u>Plaintiff's Exhibits</u>	<u>Defendant's Objections</u>
		(FRCP §§ 26(a)(3)(A)(iii), 26(f), <i>et seq.</i> ; FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630- 631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
4.	Telegram post by Defendant Patrick Byrne on October 20, 2022 reposting post from Qtime Network, including associated comments (RHB00697)	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence, produced and identified late, in violation of FRCP Rule 26(f). (FRCP §§ 26(a)(3)(A)(iii), 26(f), <i>et seq.</i> ; FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630- 631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
5.	Telegram post by Defendant Patrick Byrne on December 12, 2022, including associated comments	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence,

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<u>Ex. No.</u>	<u>Plaintiff's Exhibits</u>	<u>Defendant's Objections</u>
	(RHB00698)	produced and identified late, in violation of FRCP Rule 26(f). (FRCP §§ 26(a)(3)(A)(iii), 26(f), <i>et seq.</i> ; FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
6.	X post by Defendant Patrick Byrne on January 5, 2023, including associated comments (RHB00718)	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence, produced and identified late, in violation of FRCP Rule 26(f). (FRCP §§ 26(a)(3)(A)(iii), 26(f), <i>et seq.</i> ; FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
7.	X post by Defendant Patrick Byrne	Objection: Lacks foundation,

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<u>Ex. No.</u>	<u>Plaintiff's Exhibits</u>	<u>Defendant's Objections</u>
	on January 7, 2023, including associated comments (RHB00721)	authenticity, hearsay, irrelevant, improper character evidence, produced and identified late, in violation of FRCP Rule 26(f). (FRCP §§ 26(a)(3)(A)(iii), 26(f), <i>et seq.</i> ; FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
8.	X post by Defendant Patrick Byrne on February 10, 2023, including associated comments (RHB00699)	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence, produced and identified late, in violation of FRCP Rule 26(f). (FRCP §§ 26(a)(3)(A)(iii), 26(f), <i>et seq.</i> ; FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d

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<u>Ex. No.</u>	<u>Plaintiff's Exhibits</u>	<u>Defendant's Objections</u>
		1060, 1064-1065.)
9.	X post by Defendant Patrick Byrne on February 12 2023, including associated comments (RHB00700)	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence, produced and identified late, in violation of FRCP Rule 26(f). (FRCP §§ 26(a)(3)(A)(iii), 26(f), <i>et seq.</i> ; FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
10.	X post by Defendant Patrick Byrne on February 24, 2023, including associated comments (RHB00701)	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence, produced and identified late, in violation of FRCP Rule 26(f). (FRCP §§ 26(a)(3)(A)(iii), 26(f), <i>et seq.</i> ; FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life &</i>

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<u>Ex. No.</u>	<u>Plaintiff's Exhibits</u>	<u>Defendant's Objections</u>
		<i>Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
11.	X post by Defendant Patrick Byrne on March 17, 2023, including associated comments (RHB00100, RHB00702)	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence, produced and identified late, in violation of FRCP Rule 26(f). (FRCP §§ 26(a)(3)(A)(iii), 26(f), <i>et seq.</i> ; FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630- 631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
12.	X post by Defendant Patrick Byrne on March 28, 2023 (RHB00110, 150)	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence. (FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i>

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		(CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
13.	X post by Defendant Patrick Byrne on April 17, 2023, including associated comments (RHB00716)	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence, produced and identified late, in violation of FRCP Rule 26(f). (FRCP §§ 26(a)(3)(A)(iii), 26(f), <i>et seq.</i> ; FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
14.	X post by Defendant Patrick Byrne on May 10, 2023, including associated comments (RHB00720)	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence, produced and identified late, in violation of FRCP Rule 26(f). (FRCP §§ 26(a)(3)(A)(iii), 26(f), <i>et seq.</i> ; FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-

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		631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
15.	Screenshot of link to Defendant Patrick Byrne's May 10, 2023 interview on <i>The Absolute Truth with Emerald Robinson</i> (RHB00186)	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence. (FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
16.	Screenshot of link to Defendant Patrick Byrne's May 11, 2023 interview on <i>The Absolute Truth with Emerald Robinson</i> (RHB00187)	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence. (FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)

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17.	Transcript of Defendant Patrick Byrne's May 11, 2023 interview on <i>The Absolute Truth with Emerald Robinson</i> (RHB00711-RHB00715)	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence, produced and identified late, in violation of FRCP Rule 26(f). (FRCP §§ 26(a)(3)(A)(iii), 26(f), <i>et seq.</i> ; FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
18.	Certified Transcript of Defendant Patrick Byrne's May 11, 2023 interview on <i>The Absolute Truth with Emerald Robinson</i>	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence, produced and identified late, in violation of FRCP Rule 26(f). (FRCP §§ 26(a)(3)(A)(iii), 26(f), <i>et seq.</i> ; FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i>

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		(CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
19.	X post by Defendant Patrick Byrne on May 12, 2023, including associated comments (RHB00101, 104)	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence. (FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
20.	X post by Defendant Patrick Byrne on May 12, 2023, including associated comments (RHB00102-103, 112-117, 119)	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence. (FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
21.	Telegram post by Defendant Patrick Byrne on June 24, 2023, including	Objection: Lacks foundation, authenticity, hearsay, irrelevant,

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	associated comments (RHB00703)	improper character evidence, produced and identified late, in violation of FRCP Rule 26(f). (FRCP §§ 26(a)(3)(A)(iii), 26(f), <i>et seq.</i> ; FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
22.	X post by Defendant Patrick Byrne on June 25, 2023, including associated comments (RHB00719)	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence, produced and identified late, in violation of FRCP Rule 26(f). (FRCP §§ 26(a)(3)(A)(iii), 26(f), <i>et seq.</i> ; FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)

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<u>Ex. No.</u>	<u>Plaintiff's Exhibits</u>	<u>Defendant's Objections</u>
23.	Telegram post by Defendant Patrick Byrne on June 27, 2023, including associated comments (RHB00151-152)	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence. (FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
24.	Telegram post by Defendant Patrick Byrne on June 27, 2023, including associated comments (RHB00153-155)	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence. (FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
25.	Telegram post by Defendant Patrick Byrne on June 28, 2023, including associated comments (RHB00157)	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence. (FRE §§ 401-404, 801, 901;

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		<i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
26.	X post by Defendant Patrick Byrne on June 29, 2023, including associated comments (RHB00105-106)	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence. (FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
27.	Telegram posts by Defendant Patrick Byrne on July 4, 2023, including associated comments (RHB00156)	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence. (FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i>

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<u>Ex. No.</u>	<u>Plaintiff's Exhibits</u>	<u>Defendant's Objections</u>
		(CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
28.	Telegram post by Defendant Patrick Byrne on July 5, 2023, including associated comments (RHB00158-161)	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence. (FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
29.	Telegram post by Defendant Patrick Byrne on July 6, 2023, including associated comments (RHB00162)	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence. (FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
30.	Telegram post by Defendant Patrick Byrne on July 21, 2023, including	Objection: Lacks foundation, authenticity, hearsay, irrelevant,

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	associated comments (RHB00163-164)	improper character evidence. (FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
31.	Screenshot of link to Defendant Patrick Byrne's July 21, 2023 interview with Alex Jones on <i>The Alex Jones Show</i> (RHB00185)	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence. (FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
32.	Transcript of Defendant Patrick Byrne's July 21, 2023 interview with Alex Jones on <i>The Alex Jones Show</i> (RHB00722-RHB00789)	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence, produced and identified late, in violation of FRCP Rule 26(f). (FRCP §§ 26(a)(3)(A)(iii), 26(f),

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		<i>et seq.</i> ; FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
33.	Certified Transcript of Defendant Patrick Byrne's July 21, 2023 interview with Alex Jones on <i>The Alex Jones Show</i>	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence, produced and identified late, in violation of FRCP Rule 26(f). (FRCP §§ 26(a)(3)(A)(iii), 26(f), <i>et seq.</i> ; FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
34.	Telegram post by Defendant Patrick Byrne on July 22, 2023, including associated comments (RHB00167)	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence. (FRE §§ 401-404, 801, 901;

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<u>Ex. No.</u>	<u>Plaintiff's Exhibits</u>	<u>Defendant's Objections</u>
		<i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
35.	Telegram post by Defendant Patrick Byrne on July 28, 2023, including associated comments (RHB00168)	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence. (FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
36.	Screenshot of link to Defendant Patrick Byrne's September 8, 2023 interview on <i>The Courtenay Turner Podcast</i> , Episode 305: <i>Behind the Testimony of America's #1 Domestic Extremist w/ Patrick Byrne</i> (RHB00184)	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence. (FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i>

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<u>Ex. No.</u>	<u>Plaintiff's Exhibits</u>	<u>Defendant's Objections</u>
		(CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
37.	Transcript of Defendant Patrick Byrne's September 8, 2023 interview on <i>The Courtenay Turner Podcast</i> , Episode 305: <i>Behind the Testimony of America's #1 Domestic Extremist w/ Patrick Byrne</i> (RHB00790-RHB00846)	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence, produced and identified late, in violation of FRCP Rule 26(f). (FRCP §§ 26(a)(3)(A)(iii), 26(f), <i>et seq.</i> ; FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
38.	Certified Transcript of Defendant Patrick Byrne's September 8, 2023 interview on <i>The Courtenay Turner Podcast</i> , Episode 305: <i>Behind the Testimony of America's #1 Domestic Extremist w/ Patrick Byrne</i>	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence, produced and identified late, in violation of FRCP Rule 26(f). (FRCP §§ 26(a)(3)(A)(iii), 26(f), <i>et seq.</i> ; FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-

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<u>Ex. No.</u>	<u>Plaintiff's Exhibits</u>	<u>Defendant's Objections</u>
		631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
39.	Telegram post by Defendant Patrick Byrne on September 17, 2023, including associated comments (RHB00169)	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence. (FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
40.	X post by Defendant Patrick Byrne on October 8, 2023 (RHB00147; Pg. 3 of Exhibit B to Plaintiff's Complaint)	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence. (FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)

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Westlake Village, CA 91361

<u>Ex. No.</u>	<u>Plaintiff's Exhibits</u>	<u>Defendant's Objections</u>
41.	X post by Defendant Patrick Byrne on October 8, 2023, including associated comments (RHB00146; Pg. 2 of Exhibit B to Plaintiff's Complaint)	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence. (FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
42.	X post by Rep. Eric Swalwell on October 8, 2023, including associated comments (RHB00143-145)	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence. (FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
43.	X post by @AzPinkLady on October 11, 2023, including associated comments (RHB00125-126)	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence. (FRE §§ 401-404, 801, 901;

LAW OFFICES OF MICHAEL C. MURPHY
2625 Townsgate Road, Suite 330
Westlake Village, CA 91361

<u>Ex. No.</u>	<u>Plaintiff's Exhibits</u>	<u>Defendant's Objections</u>
		<i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
44.	X post by @AzPinkLady on October 11, 2023, including associated comments (RHB00128)	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence. (FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
45.	X post by Defendant Patrick Byrne on October 17, 2023, including associated comments (RHB00141-142)	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence. (FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i>

LAW OFFICES OF MICHAEL C. MURPHY
2625 Townsgate Road, Suite 330
Westlake Village, CA 91361

<u>Ex. No.</u>	<u>Plaintiff's Exhibits</u>	<u>Defendant's Objections</u>
		(CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
46.	X post by Defendant Patrick Byrne on October 17, 2023, including associated comments (RHB00148)	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence. (FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
47.	X post by Defendant Patrick Byrne on October 23, 2023, including associated comments (RHB00109)	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence. (FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
48.	October 26, 2023 Demand for Retraction Letter to Defendant	Objection: Lacks foundation, authenticity, hearsay, irrelevant,

LAW OFFICES OF MICHAEL C. MURPHY
2625 Townsgate Road, Suite 330
Westlake Village, CA 91361

<u>Ex. No.</u>	<u>Plaintiff's Exhibits</u>	<u>Defendant's Objections</u>
	Patrick Byrne, sent by Plaintiff's counsel of record (RHB00404-406)	improper character evidence. (FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
49.	X post by Defendant Patrick Byrne on November 9, 2023, including associated comments (RHB00124, 149)	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence. (FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
50.	X post by Defendant Patrick Byrne on November 9, 2023, including associated comments (RHB00102-103, 112-117, 119)	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence. (FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631;

LAW OFFICES OF MICHAEL C. MURPHY
2625 Townsgate Road, Suite 330
Westlake Village, CA 91361

<u>Ex. No.</u>	<u>Plaintiff's Exhibits</u>	<u>Defendant's Objections</u>
		<i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
51.	Truth Social post by @RickRichGuillot on November 9, 2023, including associated comments (RHB00171)	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence. (FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
52.	X post by Defendant Patrick Byrne on November 10, 2023, including associated comments (RHB00118, 137)	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence. (FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)

LAW OFFICES OF MICHAEL C. MURPHY
2625 Townsgate Road, Suite 330
Westlake Village, CA 91361

<u>Ex. No.</u>	<u>Plaintiff's Exhibits</u>	<u>Defendant's Objections</u>
53.	X post by Defendant Patrick Byrne on November 13, 2023, including associated comments (RHB00108, 132)	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence. (FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
54.	Screenshot of link to Defendant Patrick Byrne's November 13, 2023 interview with Roger Stone on his podcast <i>The StoneZONE with Roger Stone</i> , titled " <i>Sued by Hunter Biden Former Overstock CEO Patrick Byrne Enters the StoneZONE</i> " (RHB00183)	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence. (FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
55.	Transcript of Defendant Patrick Byrne's November 13, 2023 interview with Roger Stone on his podcast <i>The StoneZONE with Roger</i>	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence, produced and identified late, in

LAW OFFICES OF MICHAEL C. MURPHY
2625 Townsgate Road, Suite 330
Westlake Village, CA 91361

<u>Ex.</u> <u>No.</u>	<u>Plaintiff's Exhibits</u>	<u>Defendant's Objections</u>
	<i>Stone</i> , titled “ <i>Sued by Hunter Biden Former Overstock CEO Patrick Byrne Enters the StoneZONE</i> ” (RHB00847-RHB00864)	violation of FRCP Rule 26(f). (FRCP §§ 26(a)(3)(A)(iii), 26(f), <i>et seq.</i> ; FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
56.	Certified Transcript of Defendant Patrick Byrne’s November 13, 2023 interview with Roger Stone on his podcast <i>The StoneZONE with Roger Stone</i> , titled “ <i>Sued by Hunter Biden Former Overstock CEO Patrick Byrne Enters the StoneZONE</i> ”	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence, produced and identified late, in violation of FRCP Rule 26(f). (FRCP §§ 26(a)(3)(A)(iii), 26(f), <i>et seq.</i> ; FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
57.	X post by @AzPinkLady on November 14, 2023, including	Objection: Lacks foundation, authenticity, hearsay, irrelevant,

LAW OFFICES OF MICHAEL C. MURPHY
2625 Townsgate Road, Suite 330
Westlake Village, CA 91361

<u>Ex. No.</u>	<u>Plaintiff's Exhibits</u>	<u>Defendant's Objections</u>
	associated comments (RHB00129-131)	improper character evidence. (FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
58.	Telegram post by Defendant Patrick Byrne on December 5, 2023, including associated comments (RHB00166)	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence. (FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
59.	Transcript from George Berges' January 9, 2024 Congressional Transcribed Interview with the House Committee on Oversight and Accountability and House Committee on the Judiciary	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence. (FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631;

LAW OFFICES OF MICHAEL C. MURPHY
2625 Townsgate Road, Suite 330
Westlake Village, CA 91361

<u>Ex. No.</u>	<u>Plaintiff's Exhibits</u>	<u>Defendant's Objections</u>
	(RHB00266-403)	<i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
60.	January 9, 2024 Letter to Rep James Comer, Chairman of the House Committee on Oversight and Accountability, and Rep. Jim Jordan, Chairman of the House Committee on the Judiciary, from William Pittard, counsel for George Berges (RHB00407-410)	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence. (FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
61.	X post by @AzPinkLady on January 11, 2024 (RHB00134)	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence. (FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)

LAW OFFICES OF MICHAEL C. MURPHY
2625 Townsgate Road, Suite 330
Westlake Village, CA 91361

<u>Ex. No.</u>	<u>Plaintiff's Exhibits</u>	<u>Defendant's Objections</u>
62.	X post by @AzPinkLady on January 11, 2024 (RHB00135)	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence. (FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
63.	X post by Senator mark Kelly on January 11, 2024, including associated comments (RHB00136)	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence. (FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
64.	Telegram post by Scott Adams on February 4, 2024, including associated comments (RHB00165)	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence. (FRE §§ 401-404, 801, 901;

LAW OFFICES OF MICHAEL C. MURPHY
2625 Townsgate Road, Suite 330
Westlake Village, CA 91361

<u>Ex. No.</u>	<u>Plaintiff's Exhibits</u>	<u>Defendant's Objections</u>
		<i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
65.	Truth Social post by Defendant Patrick Byrne on February 13, 2024, including associated comments (RHB00170)	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence. (FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
66.	Truth Social post by Defendant Patrick Byrne on February 22, 2024, including associated comments (RHB00172)	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence. (FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i>

LAW OFFICES OF MICHAEL C. MURPHY
2625 Townsgate Road, Suite 330
Westlake Village, CA 91361

<u>Ex. No.</u>	<u>Plaintiff's Exhibits</u>	<u>Defendant's Objections</u>
		(CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
67.	Text Thread between Defendant Patrick Byrne and Anil Anwar between March 16, 2024 to April 16, 2024 (Byrne_0000021)	Objection: Lacks foundation, authenticity, hearsay, irrelevant. (FRE §§ 401-403, 801, 901.)
68.	April 1, 2024 Affidavit of John Moynihan (Byrne_000001-3)	
69.	X post by Defendant Patrick Byrne on April 8, 2024, including associated comments (RHB00717)	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence, produced and identified late, in violation of FRCP Rule 26(f). (FRCP §§ 26(a)(3)(A)(iii), 26(f), <i>et seq.</i> ; FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
70.	X post by Defendant Patrick Byrne on April 25, 2024 (RHB00107)	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence.

LAW OFFICES OF MICHAEL C. MURPHY
2625 Townsgate Road, Suite 330
Westlake Village, CA 91361

<u>Ex. No.</u>	<u>Plaintiff's Exhibits</u>	<u>Defendant's Objections</u>
		(FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
71.	X post by @AzPinkLady on April 25, 2024, including associated comments (RHB00127)	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence. (FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
72.	Telegram post by Defendant Patrick Byrne on June 5, 2024, including associated comments (RHB00704)	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence, produced and identified late, in violation of FRCP Rule 26(f). (FRCP §§ 26(a)(3)(A)(iii), 26(f), <i>et seq.</i> ; FRE §§ 401-404, 801,

LAW OFFICES OF MICHAEL C. MURPHY
2625 Townsgate Road, Suite 330
Westlake Village, CA 91361

<u>Ex. No.</u>	<u>Plaintiff's Exhibits</u>	<u>Defendant's Objections</u>
		901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
73.	X post by @AzPinkLady on June 30, 2024 (RHB00133)	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence. (FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
74.	X post by Defendant Patrick Byrne on July 22, 2024, including associated comments (RHB00138-140)	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence. (FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i>

LAW OFFICES OF MICHAEL C. MURPHY
2625 Townsgate Road, Suite 330
Westlake Village, CA 91361

<u>Ex. No.</u>	<u>Plaintiff's Exhibits</u>	<u>Defendant's Objections</u>
		(CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
75.	August 9, 2024, Defendant Patrick Byrne's verified Further Responses to Plaintiff's Interrogatories, Set One	
76.	September 5, 2024, Defendant Patrick Byrne's Responses to Plaintiff's Interrogatories, Set Two	
77.	September 5, 2024, Defendant Patrick Byrne's Responses to Plaintiff's Interrogatories, Set Three	
78.	September 9, 2024, emails between Plaintiff's counsel of record and Jared Roberts, attorney for Ret. Lt. Gen. Michael Flynn (RHB00506-508)	Objection: Lacks foundation, authenticity, hearsay, irrelevant. (FRE §§ 401-403, 801, 901.)
79.	September 17, 2024, Defendant Patrick Byrne's Further Responses to Plaintiff's Requests for Production of Documents, Set One	
80.	September 19, 2024, Defendant Patrick Byrne's verified Further Responses to Plaintiff's Requests	

LAW OFFICES OF MICHAEL C. MURPHY
2625 Townsgate Road, Suite 330
Westlake Village, CA 91361

<u>Ex.</u> <u>No.</u>	<u>Plaintiff's Exhibits</u>	<u>Defendant's Objections</u>
	for Admissions, Set One	
81.	September 19, 2024, Defendant Patrick Byrne's Further Responses to Plaintiff's Requests Admissions, Set Two	
82.	September 19, 2024 Letter to Capitol Times Media LLC from Plaintiff's counsel of record (RHB00445-505)	Objection: Lacks foundation, authenticity, hearsay, irrelevant. (FRE §§ 401-403, 801, 901.)
83.	Telegram post by Defendant Patrick Byrne on October 7, 2024, including associated comments (RHB00705)	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence, produced and identified late, in violation of FRCP Rule 26(f). (FRCP §§ 26(a)(3)(A)(iii), 26(f), <i>et seq.</i> ; FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
84.	October 10, 2024, Defendant Patrick Byrne's Further Responses	

LAW OFFICES OF MICHAEL C. MURPHY
2625 Townsgate Road, Suite 330
Westlake Village, CA 91361

<u>Ex. No.</u>	<u>Plaintiff's Exhibits</u>	<u>Defendant's Objections</u>
	to Plaintiff's Requests for Production of Documents, Set Three	
85.	October 10, 2024, Defendant Patrick Byrne's Further Responses to Plaintiff's Requests for Production of Documents, Set Four	
86.	X post by Defendant Patrick Byrne on October 26, 2024, including associated comments (RHB00706)	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence, produced and identified late, in violation of FRCP Rule 26(f). (FRCP §§ 26(a)(3)(A)(iii), 26(f), <i>et seq.</i> ; FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630- 631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
87.	October 29, 2024 Screenshot of Defendant Patrick Byrne's X Profile (RHB00707)	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence, produced and identified late, in violation of FRCP Rule 26(f).

LAW OFFICES OF MICHAEL C. MURPHY
2625 Townsgate Road, Suite 330
Westlake Village, CA 91361

<u>Ex. No.</u>	<u>Plaintiff's Exhibits</u>	<u>Defendant's Objections</u>
		(FRCP §§ 26(a)(3)(A)(iii), 26(f), <i>et seq.</i> ; FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630- 631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
88.	October 29, 2024 Screenshot of website enemywithindocuseries.com (RHB00708)	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence, produced and identified late, in violation of FRCP Rule 26(f). (FRCP §§ 26(a)(3)(A)(iii), 26(f), <i>et seq.</i> ; FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630- 631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
89.	October 29, 2024 Screenshot of Defendant Patrick Byrne's book, <i>The Deep Rig: How Election Fraud</i>	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence,

LAW OFFICES OF MICHAEL C. MURPHY
2625 Townsgate Road, Suite 330
Westlake Village, CA 91361

<u>Ex. No.</u>	<u>Plaintiff's Exhibits</u>	<u>Defendant's Objections</u>
	<i>Cost Donald J. Trump the White House, By a Man Who did not Vote for Him: (or what to send friends who ask "Why do you doubt the integrity of Election 2020", for sale on Amazon.com (RHB00710)</i>	produced and identified late, in violation of FRCP Rule 26(f). (FRCP §§ 26(a)(3)(A)(iii), 26(f), <i>et seq.</i> ; FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
90.	October 29, 2024 Screenshot of Defendant Patrick Byrne's book, <i>Danger Close: Domestic Extremist #1 Comes Clean</i> , for sale on Amazon.com (RHB00709)	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence, produced and identified late, in violation of FRCP Rule 26(f). (FRCP §§ 26(a)(3)(A)(iii), 26(f), <i>et seq.</i> ; FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
91.	Defendant Patrick Byrne's book,	Objection: Lacks foundation,

LAW OFFICES OF MICHAEL C. MURPHY
2625 Townsgate Road, Suite 330
Westlake Village, CA 91361

<u>Ex. No.</u>	<u>Plaintiff's Exhibits</u>	<u>Defendant's Objections</u>
	including audio version, <i>Danger Close: Domestic Extremist #1 Comes Clean</i> , published on February 15, 2024 (RHB00509-RHB00694)	authenticity, hearsay, irrelevant, improper character evidence, produced and identified late, in violation of FRCP Rule 26(f). (FRCP §§ 26(a)(3)(A)(iii), 26(f), <i>et seq.</i> ; FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
92.	Truth Social post by @TXFreedom4Ever in 2023 (exact date unknown), including associated comments (RHB00173)	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence. (FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
93.	Truth Social post by @DEFCONMarine in 2023 (exact	Objection: Lacks foundation, authenticity, hearsay, irrelevant,

LAW OFFICES OF MICHAEL C. MURPHY
2625 Townsgate Road, Suite 330
Westlake Village, CA 91361

<u>Ex. No.</u>	<u>Plaintiff's Exhibits</u>	<u>Defendant's Objections</u>
	date unknown), including associated comments (RHB00178)	improper character evidence. (FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
94.	Truth Social post by @RealRogerStone in 2023 (exact date unknown), including associated comments (RHB00179)	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence. (FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
95.	Truth Social post by @AgnesBenko in 2023 (exact date unknown), including associated comments (RHB00180)	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence. (FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631;

LAW OFFICES OF MICHAEL C. MURPHY
2625 Townsgate Road, Suite 330
Westlake Village, CA 91361

<u>Ex. No.</u>	<u>Plaintiff's Exhibits</u>	<u>Defendant's Objections</u>
		<i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
96.	Truth Social post by @cziggy218 in 2023 (exact date unknown), including associated comments (RHB00181)	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence. (FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
97.	Truth Social post by @nancydunks in 2023 (exact date unknown), including associated comments (RHB00182)	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence. (FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)

LAW OFFICES OF MICHAEL C. MURPHY
2625 Townsgate Road, Suite 330
Westlake Village, CA 91361

<u>Ex. No.</u>	<u>Plaintiff's Exhibits</u>	<u>Defendant's Objections</u>
98.	Truth Social post by Defendant Patrick Byrne in 2024 (exact date unknown), including associated comments (RHB00174)	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence. (FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
99.	Truth Social post by Defendant Patrick Byrne in 2024 (exact date unknown), including associated comments (RHB00176)	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence. (FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
100.	Truth Social post by Defendant Patrick Byrne in 2024 (exact date unknown), including associated comments (RHB00170)	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence. (FRE §§ 401-404, 801, 901;

LAW OFFICES OF MICHAEL C. MURPHY
2625 Townsgate Road, Suite 330
Westlake Village, CA 91361

<u>Ex. No.</u>	<u>Plaintiff's Exhibits</u>	<u>Defendant's Objections</u>
		<i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
101.	Truth Social post by Defendant Patrick Byrne in 2024 (exact date unknown), including associated comments (RHB00175)	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence. (FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
102.	Remittance Advance Invoice from Simon & Schuster UK Ltd., dated September 4, 2021 (RHB00411)	Objection: Lacks foundation, authenticity, hearsay, irrelevant. (FRE §§ 401-403, 801, 901.)
103.	Royalty Statements from Simon & Schuster from March 2020 through September 2024 (RHB00412-443)	Objection: Lacks foundation, authenticity, hearsay, irrelevant. (FRE §§ 401-403, 801, 901.)
104.	Royalty Ledger from Book/Lab Literary Agency (date unknown)	Objection: Lacks foundation, authenticity, hearsay, irrelevant.

LAW OFFICES OF MICHAEL C. MURPHY
2625 Townsgate Road, Suite 330
Westlake Village, CA 91361

<u>Ex. No.</u>	<u>Plaintiff's Exhibits</u>	<u>Defendant's Objections</u>
	(RHB00444)	(FRE §§ 401-403, 801, 901.)
105.	Hunter Biden <i>Beautiful Things</i> Press Kit (RHB00189-265)	Objection: Lacks foundation, authenticity, hearsay, irrelevant. (FRE §§ 401-403, 801, 901.)
106.	Audio Recording produced by Defendant in Discovery on August 27, 2024 titled "HIGHLY CONFIDENTIAL – AUDIO-2021-08-15-10-07-25"	
107.	Certified Transcript of Audio Recording produced by Defendant in Discovery on August 27, 2024 titled "HIGHLY CONFIDENTIAL – AUDIO-2021-08-15-10-07-25" (RHB01413-1414)	Objection: Lacks foundation, authenticity, produced and identified late, in violation of FRCP Rule 26(f). (FRCP §§ 26(a)(3)(A)(iii), 26(f), <i>et seq.</i> ; FRE § 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
108.	Audio Recording produced by Defendant in Discovery on August 27, 2024 titled "HIGHLY CONFIDENTIAL – AUDIO-2021-	

LAW OFFICES OF MICHAEL C. MURPHY
2625 Townsgate Road, Suite 330
Westlake Village, CA 91361

<u>Ex. No.</u>	<u>Plaintiff's Exhibits</u>	<u>Defendant's Objections</u>
	08-24-08-46-17"	
109.	Certified Transcript of Audio Recording produced by Defendant in Discovery on August 27, 2024 titled "HIGHLY CONFIDENTIAL – AUDIO-2021-08-24-08-46-17" (RHB01415-1416)	Objection: Lacks foundation, authenticity, produced and identified late, in violation of FRCP Rule 26(f). (FRCP §§ 26(a)(3)(A)(iii), 26(f), <i>et seq.</i> ; FRE§ 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
110.	Audio Recording produced by Defendant in Discovery on August 27, 2024 titled "HIGHLY CONFIDENTIAL – AUDIO-2021-08-24-14-43-38"	
111.	Certified Transcript of Audio Recording produced by Defendant in Discovery on August 27, 2024 titled "HIGHLY CONFIDENTIAL – AUDIO-2021-08-24-14-43-38" (RHB01417-1418)	Objection: Lacks foundation, authenticity, produced and identified late, in violation of FRCP Rule 26(f). (FRCP §§ 26(a)(3)(A)(iii), 26(f), <i>et seq.</i> ; FRE§ 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627,

LAW OFFICES OF MICHAEL C. MURPHY
2625 Townsgate Road, Suite 330
Westlake Village, CA 91361

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		630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
112.	Defendant's passport photographs produced by Defendant in discovery on November 4, 2024 (Byrne_0000024-Byrne_0000045)	
113.	Defendant's "medical notes" provided by Defendant via email on November 4, 2024	
114.	Defendant's American Express recorded from July 2023, produced by Defendant in discovery on January 17, 2025 as (Byrne_0000046-Byrne_0000047)	
115.	Defendant Patrick Byrne's responses to Rule 26 Initial Disclosures,	
116.	Defendant Patrick Byrne's responses to Special Interrogatories	
117.	Certified copy of the Order After Trial, <i>Nazerli v. Mitchell, et al.</i> No. S-116979	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence,

LAW OFFICES OF MICHAEL C. MURPHY
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Westlake Village, CA 91361

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		produced and identified late, in violation of FRCP Rule 26(f). (FRCP §§ 26(a)(3)(A)(iii), 26(f), <i>et seq.</i> ; FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
118.	Certified copy of Reasons for Judgment, <i>Nazerali v. Mitchell, et al.</i> No. S-116979	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence, produced and identified late, in violation of FRCP Rule 26(f). (FRCP §§ 26(a)(3)(A)(iii), 26(f), <i>et seq.</i> ; FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
119.	IRS Amended 990 Form for The	Objection: Lacks foundation,

LAW OFFICES OF MICHAEL C. MURPHY
2625 Townsgate Road, Suite 330
Westlake Village, CA 91361

<u>Ex. No.</u>	<u>Plaintiff's Exhibits</u>	<u>Defendant's Objections</u>
	American Project for 2021	authenticity, hearsay, irrelevant, violates Defendant's privacy, and seeks premature disclosure of Defendant's financial condition, produced and identified late, in violation of FRCP Rule 26(f). (FRCP §§ 26(a)(3)(A)(iii), 26(f), <i>et seq.</i> ; Civ. Code § 3294-3295; <i>Holdgrafer v Unocal Corp.</i> 160 Cal.App.4 th 907, 919 (2008); See <i>Vasbinder v Ambach</i> 926 F.2d 1333, 1344 (2d Cir. 1991).)
120.	IRS 990 Form for The American Project for 2021	Objection: Lacks foundation, authenticity, hearsay, irrelevant, violates Defendant's privacy, and seeks premature disclosure of Defendant's financial condition, produced and identified late, in violation of FRCP Rule 26(f). (FRCP §§ 26(a)(3)(A)(iii), 26(f), <i>et seq.</i> ; Civ. Code § 3294-3295; <i>Holdgrafer v Unocal Corp.</i> 160

LAW OFFICES OF MICHAEL C. MURPHY
2625 Townsgate Road, Suite 330
Westlake Village, CA 91361

<u>Ex.</u> <u>No.</u>	<u>Plaintiff's Exhibits</u>	<u>Defendant's Objections</u>
		Cal.App.4 th 907, 919 (2008); See <i>Vasbinder v Ambach</i> 926 F.2d 1333, 1344 (2d Cir. 1991).)
121.	IRS 990 Form for The American Project for 2022	Objection: Lacks foundation, authenticity, hearsay, irrelevant, violates Defendant's privacy, and seeks premature disclosure of Defendant's financial condition, produced and identified late, in violation of FRCP Rule 26(f). (FRCP §§ 26(a)(3)(A)(iii), 26(f), <i>et seq.</i> ; Civ. Code § 3294-3295; <i>Holdgrafer v Unocal Corp.</i> 160 Cal.App.4 th 907, 919 (2008); See <i>Vasbinder v Ambach</i> 926 F.2d 1333, 1344 (2d Cir. 1991).)
122.	US Securities and Exchange Commission Form 4 for Overstock.com, Inc., 9/18/2019	Objection: Lacks foundation, authenticity, hearsay, irrelevant, violates Defendant's privacy, and seeks premature disclosure of Defendant's financial condition, produced and identified late, in violation of

LAW OFFICES OF MICHAEL C. MURPHY
2625 Townsgate Road, Suite 330
Westlake Village, CA 91361

<u>Ex. No.</u>	<u>Plaintiff's Exhibits</u>	<u>Defendant's Objections</u>
		FRCP Rule 26(f). (FRCP §§ 26(a)(3)(A)(iii), 26(f), <i>et seq.</i> ; Civ. Code § 3294-3295; <i>Holdgrafer v Unocal Corp.</i> 160 Cal.App.4 th 907, 919 (2008); See <i>Vasbinder v Ambach</i> 926 F.2d 1333, 1344 (2d Cir. 1991).)
123.	X post by Defendant Patrick Byrne on January 10, re Com Glover and January 6 crowd	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence, produced and identified late, in violation of FRCP Rule 26(f). (FRCP §§ 26(a)(3)(A)(iii), 26(f), <i>et seq.</i> ; FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
124.	Substack post by Defendant Patrick Byrne on January 10, re Comm. Glover and January 6 crowd	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence, produced and identified late, in

LAW OFFICES OF MICHAEL C. MURPHY
2625 Townsgate Road, Suite 330
Westlake Village, CA 91361

<u>Ex. No.</u>	<u>Plaintiff's Exhibits</u>	<u>Defendant's Objections</u>
		violation of FRCP Rule 26(f). (FRCP §§ 26(a)(3)(A)(iii), 26(f), <i>et seq.</i> ; FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
125.	X post by Defendant Patrick Byrne on January 15 re we are undefeated	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence, produced and identified late, in violation of FRCP Rule 26(f). (FRCP §§ 26(a)(3)(A)(iii), 26(f), <i>et seq.</i> ; FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
126.	X post by Defendant Patrick Byrne on January 22 re greatest patriots of	Objection: Lacks foundation, authenticity, hearsay, irrelevant,

LAW OFFICES OF MICHAEL C. MURPHY
2625 Townsgate Road, Suite 330
Westlake Village, CA 91361

<u>Ex. No.</u>	<u>Plaintiff's Exhibits</u>	<u>Defendant's Objections</u>
	our time	improper character evidence, produced and identified late, in violation of FRCP Rule 26(f). (FRCP §§ 26(a)(3)(A)(iii), 26(f), <i>et seq.</i> ; FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
127.	X post by Defendant Patrick Byrne on January 25 re January 6	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence, produced and identified late, in violation of FRCP Rule 26(f). (FRCP §§ 26(a)(3)(A)(iii), 26(f), <i>et seq.</i> ; FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)

LAW OFFICES OF MICHAEL C. MURPHY
2625 Townsgate Road, Suite 330
Westlake Village, CA 91361

<u>Ex. No.</u>	<u>Plaintiff's Exhibits</u>	<u>Defendant's Objections</u>
128.	X post by Defendant Patrick Byrne on January 28 re 2020 election	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence, produced and identified late, in violation of FRCP Rule 26(f). (FRCP §§ 26(a)(3)(A)(iii), 26(f), <i>et seq.</i> ; FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
129.	X repost by Defendant Patrick Byrne on February 5 re government	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence, produced and identified late, in violation of FRCP Rule 26(f). (FRCP §§ 26(a)(3)(A)(iii), 26(f), <i>et seq.</i> ; FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i>

LAW OFFICES OF MICHAEL C. MURPHY
2625 Townsgate Road, Suite 330
Westlake Village, CA 91361

<u>Ex. No.</u>	<u>Plaintiff's Exhibits</u>	<u>Defendant's Objections</u>
		(CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
130.	X post by Defendant Patrick Byrne on March 11 re rigging of Election 2020	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence, produced and identified late, in violation of FRCP Rule 26(f). (FRCP §§ 26(a)(3)(A)(iii), 26(f), <i>et seq.</i> ; FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
131.	X repost of Jake Lang's January Political Prisoner post by Defendant Patrick Byrne	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence, produced and identified late, in violation of FRCP Rule 26(f). (FRCP §§ 26(a)(3)(A)(iii), 26(f), <i>et seq.</i> ; FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-

LAW OFFICES OF MICHAEL C. MURPHY
2625 Townsgate Road, Suite 330
Westlake Village, CA 91361

<u>Ex. No.</u>	<u>Plaintiff's Exhibits</u>	<u>Defendant's Objections</u>
		631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
132.	"The Enemy Within" Docuseries by Patrick Byrne (2024).	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence, produced and identified late, in violation of FRCP Rule 26(f). (FRCP §§ 26(a)(3)(A)(iii), 26(f), <i>et seq.</i> ; FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
133.	"The Deep Rig" Documentary by Patrick Byrne (2021).	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence, produced and identified late, in violation of FRCP Rule 26(f). (FRCP §§ 26(a)(3)(A)(iii), 26(f), <i>et seq.</i> ; FRE §§ 401-404, 801,

LAW OFFICES OF MICHAEL C. MURPHY
2625 Townsgate Road, Suite 330
Westlake Village, CA 91361

<u>Ex. No.</u>	<u>Plaintiff's Exhibits</u>	<u>Defendant's Objections</u>
		901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
134.	<i>US Dominion, Inc., Dominion Voting Systems, Inc. and Dominion Voting Systems Corporation v. Patrick Byrne</i> Complaint Civil Action No. 1:21-cv--02131	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence, produced and identified late, in violation of FRCP Rule 26(f). (FRCP §§ 26(a)(3)(A)(iii), 26(f), <i>et seq.</i> ; FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630-631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)
135.	<i>US Dominion, Inc., Dominion Voting Systems, Inc. and Dominion Voting Systems Corporation v. Patrick Byrne</i> Notice of Appeal Civil Action No. 1:21-cv--02131	Objection: Lacks foundation, authenticity, hearsay, irrelevant, improper character evidence, produced and identified late, in violation of FRCP Rule 26(f).

LAW OFFICES OF MICHAEL C. MURPHY
2625 Townsgate Road, Suite 330
Westlake Village, CA 91361

<u>Ex.</u> <u>No.</u>	<u>Plaintiff's Exhibits</u>	<u>Defendant's Objections</u>
		(FRCP §§ 26(a)(3)(A)(iii), 26(f), <i>et seq.</i> ; FRE §§ 401-404, 801, 901; <i>United States v Tank</i> (9th Cir. 2000) 200 F.3d 627, 630- 631; <i>Wady v Provident Life & Accidents Ins. Co. of America</i> (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)

Dated: July 23, 2025

LAW OFFICES OF MICHAEL C. MURPHY

By: /s/ Michael C. Murphy, Esq.

Michael C. Murphy, Esq.
Michael C. Murphy, Jr., Esq.
Attorneys for Defendant,
Patrick Byrne